

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARK BOWERS, and GERALD RENAUD,

Plaintiffs,

-v-

Case No: 08-CV-14134

Judge: Bernard Freidman

Magistrate: Donald A. Scheer

LIVINGSTON COUNTY JAIL and
SHERIFF BOB BEZOTTE,

Defendants.

ELIAS MUAWAD (P41632)
Attorney for Plaintiff
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CUMMINGS, MCCLOREY, DAVIS
and ACHO, PLC
By: T. Joseph Seward (P35095)
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**MOTION TO COMPEL ANSWERS TO PLAINTIFFS'
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW COMES, the Plaintiffs, Mark Bowers and Gerald Renaud, by and through their attorney, Elias Muawad, and files this Motion to Compel Answers to Production of Documents for the following reasons:

1. On December 11, 2008, this attorney sent to Defendant's counsel Request for Production of Documents.
2. More than twenty-eight (28) days have passed and Defendant has not answered Plaintiff's Request for Production of Documents.
3. That Plaintiff counsel has made several requests for answers to Plaintiffs' Request to Produce and has even asked defense counsel to stipulate to same and to date Mr. Seward has

WHEREFORE, it is respectfully requested that this Honorable Court compel the production of these documents pursuant to Federal Rules of Civil Procedure 37(a)(2).

Respectfully submitted,

BY: /s/ Elias Muawad
ELIAS MUAUWAD (P41632)
Attorney for Plaintiffs
36700 Woodward Ave, Ste. 209
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Dated: February 17, 2009.

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**BRIEF IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL ANSWERS TO
REQUEST FOR PRODUCTION OF DOCUMENTS**

The Plaintiffs hereby rely upon Federal Rules of Civil Procedure 37(a)(2) which states that if a party fails to make a disclosure required by Rule 26(a), any other party may move to compel disclosures and for appropriate sanctions.

This Brief also certifies that this attorney has conferred and/or attempted to confer with defense counsel to make the disclosures, however, so far, no disclosures have been made to Plaintiffs and Plaintiffs are forced to file this Motion.

Respectfully submitted,

BY: /s/ Elias Muawad
ELIAS MUAWAD (P41632)
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2009, I electronically filed Plaintiff's Motion to Compel Answers to Request for Production of Documents, Brief in Support of Plaintiff's Motion, proposed Order Compelling Answers to Request for Production of Documents, and blank Notice of Hearing with the Clerk of the Court using the ECF System, which will send notification of such filing to the following:

T. Joseph Seward (P35095) by electronic means to tjseward@cmda-law.com

Respectfully submitted,

/s/ Elias Muawad
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